

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

JANE ROE, individually and on)	CASE NO. 1:12-CV-02288
behalf of all others similarly situated,)	
)	JUDGE JAMES S. GWIN
Plaintiff,)	
)	
vs.)	<u>DECLARATION OF</u>
)	<u>PROPOSED CLASS COUNSEL</u>
INTELLICORP RECORDS, INC.,)	<u>JOSHUA R. COHEN</u>
)	
Defendant.)	
)	

I, Joshua R. Cohen, pursuant to 28 U.S.C. § 1746, hereby declare, under penalty of perjury, that the following is true and correct to the best of my personal knowledge, information, and belief:

1. I am a founding partner of Cohen Rosenthal & Kramer LLP, a law firm in Cleveland, Ohio. The firm practices exclusively in the area of civil litigation. CRK has an “av” rating from Martindale Hubbell.

2. Class actions and collective actions represent a significant aspect of CRK’s practice.

3. For instance, the firm currently serves as counsel for a national class of employees of the Aaron’s rental company in a lawsuit brought under the Fair Labor Standards Act. CRK has successfully handled other national collective actions brought under the statute.

4. I personally have extensive experience in serving as plaintiff's counsel in class actions, derivative lawsuits, and comparable litigation.

5. For instance, I served as lead counsel in *Beder v. Cleveland Browns*, Cuyahoga Cty. C. Pl. Case No. 297862, a class action brought on behalf of approximately 13,000 Cleveland Browns season ticket holders against Art Modell when the franchise moved to Baltimore.

6. I also served as lead counsel in *Lesser v. Burry*, Cuyahoga Cty. C. Pl. Case No. 332396, a derivative action brought on behalf of policyholders in Blue Cross Blue Shield (now Medical Mutual) to contest an efforts by insiders to sell the company. That case as well resulted in settlements that returned more than \$12 million to the insurer.

7. More recently, I represented the plaintiff in *Fornshell v. First Merit*, Cuyahoga Cty. C. Pl. Case No. 06-CV-592402, litigation brought by a receiver to obtain recovery for hundreds of aggrieved investors from a bank implicated in a Ponzi scheme. The lawsuit resulted in a settlement of more than \$10 million.

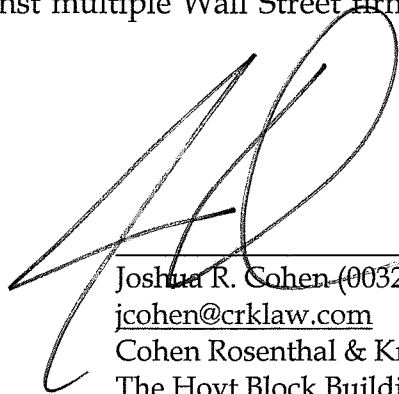
8. Courts have explicitly recognized my background in class-action litigation. For instance, In *In re Revco Sec. Litig.*, No. 1:89-cv-00593, FED. SEC. L. REP. ¶97,809 (N.D. Ohio 1993), the court stated that it had "become directly familiar with the specialized, highly competent, and effective quality of the legal services performed by ... Joshua Cohen, Esq." and other attorneys for the class.

9. The decision approving the settlement in *Beder*, the Cleveland Browns class action, also includes the following passage:

Plaintiffs' class is represented by Joshua R. Cohen, who has zealously represented the class, both in the courtroom, and elsewhere, throughout the five and one-half years of this case. Cohen works exclusively in the field of commercial litigation and is an experienced class action lawyer.

Beder v. Cleveland Browns, 114 Ohio Misc. 26, 30 (2001).

10. CRK has the resources to handle complex litigation. The firm has recently demonstrated as much in serving as the City of Cleveland's lead counsel in litigation brought against multiple Wall Street firms relating to the subprime foreclosure crisis.



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Signed in Cuyahoga County, Ohio,
this 15th day February, 2013